

AO 91 (Rev. 11/11) Criminal Complaint

MATTHEW
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Date: 2021.06.14 16:47:28
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UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America
v.
STEPHON [REDACTED] JAMAR DUNCAN

Case No. MJ-21-357 STE

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2021 in the county of Oklahoma in the
Western District of Oklahoma, the defendant(s) violated:*Code Section*

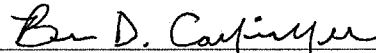
49 U.S.C. § 46504

Offense Description

Interference with Flight Crew Members and Attendants

This criminal complaint is based on these facts:

See attached Affidavit of SA, Beau Coffindaffer, FBI, which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.*Complainant's signature*

Beau Coffindaffer, SA

Printed name and title

Sworn to before me and signed in my presence.

Date: Jun 14, 2021

Lawton, OK

City and state: [REDACTED]*Judge's signature*

Judge Shon T. Erwin

Printed name and title

**WESTERN DISTRICT OF OKLAHOMA
OKLAHOMA CITY, OKLAHOMA**

STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA)

AFFIDAVIT

I, Beau D. Coffindaffer, Special Agent (SA) of the Federal Bureau of Investigation, having been duly sworn, state as follows:

EXPERIENCE AND TRAINING

1. I have been employed as a Special Agent (SA) with the FBI since March 2015 and have been assigned to the Oklahoma City Division of the FBI for approximately six years. During the past six years, I have conducted a wide variety of investigations, including cases involving terrorism, firearms violations, and crimes aboard an aircraft.

2. The information in this Affidavit is based on my review of other law enforcement officers' reports and witness statements. The information in this Affidavit is provided for the limited purpose of establishing probable cause for a criminal complaint. As this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. The facts of this Affidavit will show probable cause that on or about June 11, 2021, **Stephon Jamar Duncan (DUNCAN)**, committed acts in violation of Title 49, United States Code, § 46504, on an aircraft in the special jurisdiction of the United States.

Specifically, while on board Delta Airlines flight #1730 traveling from Los Angeles, California, to Atlanta, Georgia, **DUNCAN** assaulted and intimidated a flight crew member(s) and flight attendant(s) of the aircraft, and interfered with the performance of their duties and lessened their ability to perform their duties, which caused the flight to be diverted to Will Rogers World Airport in Oklahoma City, Oklahoma.

FACTS SUPPORTING PROBABLE CAUSE

3. On June 11, 2021, on or about 10:15pm, Will Rogers Airport Police received a disturbance call from Delta Flight #1730. Flight #1730, originally flying from Los, Angeles, California, to Atlanta, Georgia was being diverted to Oklahoma City, Oklahoma.

4. As recorded in Oklahoma City Police Department (OCPD) reports, on duty flight crew BS, PT, and KW, reported **DUNCAN** stated to Delta flight attendants that he was seated next to a terrorist.¹ **DUNCAN** had stashed personal items in various places throughout the plane, and ignored flight crew's orders to remain seated and stop disturbing and frightening passengers.

5. JK reported he saw **DUNCAN's** erratic behavior and heard **DUNCAN** get on the plane's public address (pa) system and make announcements the plane is going through turbulence, to put on seat belts, the

¹ FBI has no information to believe there was a terrorist onboard Flight #1730.

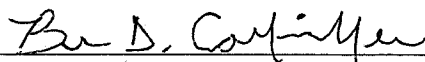
plane is being taken over and the plane will be going under ten thousand feet. **DUNCAN** ignored crew member orders to stop. **DUNCAN** assaulted BS when BS tried to stop him. **DUNCAN** put his forearm across BS's upper chest and neck area and shoved his back against the wall. CBN, an off-duty Delta crew member, attempted to help BS by pulling **DUNCAN** back away from BS. **DUNCAN** pushed CBN against the wall, put both hands around her neck, and began choking her. CBN stated that **DUNCAN** was out of control and flight crew members were concerned for themselves and the other passengers. CBN also stated that some of the flight crew asked for help from the passengers. Several crew members and passengers arrived and subdued **DUNCAN**. The pilot diverted the plane and landed in Oklahoma City.

6. KW went through the plane and retrieved some of the items **DUNCAN** had earlier placed in various areas of the plane and gave them to OCPD. These items included odd things like tennis balls, trash, and food. JS handed OCPD Officer Lile a note he had received from **DUNCAN** earlier during the flight. Officer Lile reported that the note stated, "I am ATL based--Alert Delta Manager---Terrorist on board. 95825/Contact Pilots."

CONCLUSION

7. Based on the above-stated facts, I believe that there is probable cause to charge **DUNCAN**, with the crime of Interference with Flight Crew Members and Attendants in the special aircraft jurisdiction of the United States, in violation of Title 49, United States Code § 46504.

8. I request that the Court issue an arrest warrant for **DUNCAN**.
FURTHER, YOUR AFFIANT SAYETH NOT.



BEAU D. COFFINDAFFER
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 14th day of June, 2021.



SHON T. ERWIN
United States Magistrate Judge